

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817
Case NO. 18-cv-00864

Hon. Rebecca R. Pallmeyer

**DEALERSHIP PLAINTIFFS' MOTION FOR ENTRY OF PROTECTIVE ORDER
AND REQUEST FOR EXPEDITED CONSIDERATION**

Pursuant to Federal Rules of Civil Procedure 26(b), 26(c), and 30(d)(3), Dealership Class Plaintiffs ("Dealers"), respectfully move the Court for entry of a protective order preventing Defendant CDK Global, LLC ("CDK") from reopening merits discovery and striking Topics 1(a)-(c), 3, 4 (in part), 6, 7, 8, 9, 10, and 11 as listed in Schedule A of CDK's Notice of Deposition.

In support of their motion, Dealers submit an accompanying Memorandum in Support of Dealership Plaintiffs' Motion for Entry of Protective Order and Request for Expedited Consideration.

DATED: December 11, 2023

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth (pro hac vice)

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CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on December 11, 2023, I caused a true and correct copy of the foregoing **DEALERSHIP PLAINTIFFS' MOTION FOR ENTRY OF PROTECTIVE ORDER AND REQUEST FOR EXPEDITED CONSIDERATION** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth